

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
Fort Lauderdale Division

DVASH AVIATION HOLDINGS, LLC,)	
)	
Plaintiff,)	
)	
v.)	Case No. 0:24-cv-60312-AHS
)	
AMP LEASING LIMITED, <i>et al.</i>)	
)	
Defendants.)	

JOINT SCHEDULING REPORT

Come now Dvash Aviation Holdings, LLC (“Dvash” or the “Plaintiff”) and AMP Leasing Limited (“AMP” or the “Defendant”), by and through respective undersigned counsel, pursuant to Local Rule 16.1(b)(2) and this Honorable Court’s Order Requiring Scheduling Report (DE #25) and report as follows:

Case Management Track. The parties agree that the appropriate case management is the **Expedited Track** described in Local Rule 16.1(a)(2)(A) in which discovery shall be completed within 170 days from the date of the Scheduling Order, as set forth below.

Likelihood of Settlement. The parties have had meaningful and productive conversations, through counsel, since shortly after this case was filed. While it is premature to assess the likelihood, *vel non*, of settlement, the parties are committed to continuing a substantive dialogue and will explore, at an appropriate juncture, whether or not there is economy in utilizing more formalistic mediative services.

Likelihood of Appearance of Additional Parties. The parties do not reasonably anticipate the impleading of additional parties to this suit, though they do, of course, reserve their

respective rights to do so, especially if discovery invites the revelation of information suggesting one or more other parties ought to be joined herein.

Proposed Time Limits. The parties propose that (i) any additional parties be joined, or the pleadings herein otherwise be amended, not later than 90 days after the date of entry of a scheduling order; (ii) dispositive motions be filed not later than 200 days after the date of entry of a scheduling order; and (iii) discovery be completed 170 days after the date of entry of a scheduling order. These deadlines are consistent with an expedited case management track. Discovery from a third party witness is likely to be taken in this case; should the parties experience issues obtaining such discovery, either or both parties may ask for appropriate relief—including a potential extension of the discovery period.

Proposals for the Simplification of Issues. While the parties do not have any formal proposal for the simplification of issues at this time, they are cautiously optimistic that this case will proceed in a sensible, focused, and streamlined manner, and will endeavor to resolve matters by agreement prior to engaging in motion practice.

Necessity or Desirability of Amendment to the Pleadings. The parties do not presently believe there to be a need to amend the pleadings herein, however they propose that any amendment to the pleadings take place no later than 90 days after the date of entry of a scheduling order.

Possibility of Obtaining Admissions of Fact and Documents. The parties are both cognizant of the manner in which requests for admission can be utilized to streamline a trial, while also simplifying dispositive motions practice. Without formally committing to the specific issuance of any discovery, the parties believe that—whether through discovery, stipulation, or

otherwise—they will endeavor to avoid unnecessary disputes over the authenticity of documents and numerous facts.

Suggestions for the Avoidance of Unnecessary Proof and of Cumulative Evidence. The parties are cautiously optimistic that this case will involve the testimony of a relatively small number of witnesses and the admission of a relatively small number of exhibits. The parties will work cooperatively to stipulate to facts, and to stipulate to the admissibility of exhibits, where appropriate.

Referral to a Magistrate Judge. The parties do not instantly seek referral of this matter to a Magistrate Judge, but would have no objection to discovery matters being referred to a Magistrate Judge at some point in the future, if needed.

Estimated Time for Trial. The parties believe this case can be tried in 2-3 days.

Requested Dates: The parties request that a pretrial conference be held in or about April 2025, with a trial date to follow in or about August 2025.

Specific Issues. The parties are in agreement that electronic documents will be produced in Portable Document Format unless the authenticity of a specific file is called into question, in which case production shall be made in native format, if possible. The parties are further in agreement that discovery will be both issued, and responded, to, via e-mail, with the parties using third party cloud storage systems (e.g., Dropbox) to transmit files too large to attach to e-mail. The parties also agree that the inadvertent production of any privileged document shall not be construed as a waiver of the subject privilege and either party shall, upon recognizing a potentially-privileged document to have been produced, promptly cease review of the same and notify the other party through counsel of record.

Other Relevant Information. The parties do not believe any additional information to be relevant at the present time.

[Signature and Certificate of Service on Following Pages]

Respectfully Submitted,

THE VERSTANDIG LAW FIRM, LLC

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Certificate of Service

I hereby certify that on this 30th day of July, 2024, I caused this document to be electronically filed via this Honorable Court's CM/ECF system which, in turn, caused a copy to be served upon:

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